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October 7, 2005

Mr. Michael Milby
U.S. District Clerk
515 Rusk Street
Houston, Texas 77002

Re: *C. Scott Evans v. Elizabeth Whitley and Mid-Atlantic Solutions, Inc.*, Civil Action
No. G-04-713 in the United States District Court for the Southern District of
Texas (Galveston Division)

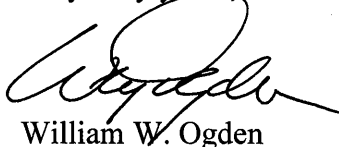
Dear Mr. Milby:

Enclosed for filing in the captioned matter please find Defendants' Expert Disclosures
under Fed. R. Civ. P. 26.

This is being filed under the court's electronic filing system, and a copy is being delivered
to plaintiff's counsel by fax and/or by hand delivery today. As set forth in the Court's scheduling
order, the reports of the retained experts are being delivered to plaintiff's counsel, but not filed
with this disclosure statement.

Thank you for your courtesies in this regard. Please contact me if additional information
is required.

Very truly yours,



William W. Ogden

WWO/mp
Enc.
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cc: Mr. Christopher W. Byrd

By Facsimile 713-759-9650

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

C. SCOTT EVANS

VS.

**ELIZABETH WHITLEY AND
MID-ATLANTIC SOLUTIONS, INC.**

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CIVIL ACTION NO. G-04-713

DEFENDANTS' EXPERT DISCLOSURES

TO: C. Scott Evans, Plaintiff, by and through his counsel of record, Christopher W. Byrd, 1177 West Loop South, Suite 700, Houston, Texas 77027:

Defendants, Elizabeth Whitley and Mid-Atlantic Solution, Inc., serve these expert disclosures as required by FED. R. CIV. P. 26(a)(2):

1. Elizabeth Whitley, Mid-Atlantic Solutions, Inc., P.O. Box 507, 650 Front Street, Lovington, Virginia, 22949, telephone (434) 263-4300. Ms. Whitley may testify as both a fact and expert witness. Based upon her background and experience, Ms. Whitley is an expert in the H2-B visa program generally, its rules, policies and procedures, including without limitation the issues involved in so-called "visa trading."
2. Robert Wingfield, 3141 Hood Street, Suite 440, Dallas, Texas, 75219, telephone (214) 526-5665. Mr. Wingfield may testify as both a fact and expert witness. Based upon his background and experience, Mr. Wingfield may testify regarding his knowledge of the H-2B visa program, the United States Consulate's administration of the program in Monterrey, Mexico, and the nature and function of H2-B agents. He is an expert in the H2-B program generally, its rules, policies and procedures, including without limitation the issues involved in so-called "visa trading." Mr. Wingfield may testify about his opinion regarding the suspensions made by the Monterrey Consulate in 2004. Mr. Wingfield may also testify regarding other issues in this case, including the effect of the letter that is the basis for Plaintiff's lawsuit, Plaintiff's reputation within the industry, and other matters.
3. Linda Dodd-Major, 3307 Highland Place, Washington, D.C. 20008, telephone (202) 248-9407, will testify as an expert witness. She is an immigration lawyer and an expert in the H2-B program generally, its rules, policies and procedures, including without limitation the issues involved in so-called "visa-trading." She may also

testify regarding the duties and functions of H2-B agents and the standard range of compensation in the H2-B industry. She may also testify with regard to ethical practices in the H2-B industry and the problem of potential conflicts of interest. Ms. Dodd-Major's report and resume are attached to the copy of this Designation that is served on Plaintiff's counsel.

4. Donald L. Mooers, 7700 Old Georgetown Rd., Suite 540, Bethesda, Maryland, 20814, telephone (301) 652-4488, will testify as an expert witness. He is an immigration attorney and an expert in the H2-B program generally, its rules, policies and procedures, including without limitation the issues involved in so-called "visa-trading." Mr. Mooers' report and resume are attached to the copy of this Designation that is served on Plaintiff's counsel.
5. Ron Klasko, Klasko, Rulon, Stock & Seltzer, LLP, 1800 John F. Kennedy Boulevard, Suite 1700, Philadelphia, PA 19103, (215) 825-8608, will testify as an expert witness. He is an immigration attorney and past president of the American Immigration Lawyers Association. Mr. Klasko is an expert in the H2-B program generally, its rules, policies and procedures, including without limitation the issues involved in so-called "visa-trading." Mr. Klasko may also testify regarding new and recently proposed amended regulations governing the H2-B program. Mr. Klasko's report and resume are attached to the copy of this Designation that is served on Plaintiff's counsel.
6. C. Scott Evans. Defendants reserve their right to challenge the expert designation of Plaintiff Evans. Alternatively, Defendants reserve their right to cross-examine Mr. Evans on any subject he is designated on as an expert witness.
7. Defendants reserve the right to call rebuttal experts for any matters on which Plaintiff may offer expert testimony at trial.

DATED and SERVED this 7th day of October, 2005.

Respectfully submitted,



William W. Ogden
Fed. Tex. ID No. 2072
Texas Bar No. 15228500

Attorney-in-Charge for Defendants

OF COUNSEL:


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BROOCKS & LONGORIA, L.L.P.
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CERTIFICATE OF SERVICE

I hereby certify that in accordance with the Federal Rules of Civil Procedure, a true and correct copy of DEFENDANT'S EXPERT DISCLOSURES has been delivered to opposing counsel, by hand delivery and/or facsimile on this the 7th day of October, 2005, to:

Christopher W. Byrd
G. P. Hardy, III
1177 West Loop South, Ste. 700
Houston, Texas 77027

By Fax: (713) 759-9650
Original By Hand Delivery


William W. Ogden

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